

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHEILA PORTER

Plaintiff,

v.

ANDREA CABRAL, SUFFOLK COUNTY
SHERIFF'S DEPARTMENT, and SUFFOLK
COUNTY

Defendant.

Civil Action No.04-11935-DPW

PLAINTIFF SHEILA PORTER'S PROPOSED JURY VERDICT SHEET

I. Federal Civil Rights (§ 1983) Claim Against Andrea Cabral

A. Did defendant Andrea Cabral violate plaintiff Sheila Porter's federal constitutional rights under color of state law?

Yes _____ No _____

B. What compensatory damages (if any) do you award to plaintiff against defendant Andrea Cabral?

C. Do you award prejudgment interest to plaintiff against defendant Andrea Cabral?

Yes _____ No _____

D. What punitive damages (if any) do you award to plaintiff against defendant Andrea Cabral?

II. Federal Civil Rights (§ 1983) Claim Against Suffolk County

A. Did defendants Suffolk County violate plaintiff Sheila Porter's federal

constitutional rights under color of state law?

Yes _____ No _____

B. What compensatory damages (if any) do you award to plaintiff against defendant Suffolk County?

C. Do you award prejudgment interest to plaintiff against defendant Suffolk County?

Yes _____ No _____

III. Federal Civil Rights (§ 1983) Claim Against Suffolk County Sheriff's Department

A. Did defendant Suffolk County Sheriff's Department violate plaintiff Sheila Porter's federal constitutional rights under color of state law?

Yes _____ No _____

B. What compensatory damages (if any) do you award to plaintiff against defendant Suffolk County Sheriff's Department?

C. Do you award prejudgment interest to plaintiff against defendant Suffolk County sheriff's Department?

Yes _____ No _____

III. Tortious Interference Claim Against Andrea Cabral

A. Did defendant Andrea Cabral tortiously interfere with plaintiff Sheila Porter's advantageous relations?

Yes _____ No _____

B. What compensatory damages (if any) do you award to plaintiff against defendant Andrea Cabral?

IV. Defamation Claim Against Andrea Cabral

A. Did statements attributable to Andrea Cabral in the Suffolk County Sheriff's Department Press Release that was broadcast by Channel 5, taken in context, defame Mrs. Porter?

Yes _____ No _____

B. Did defendant Andrea Cabral's statements at the September 8, 2004 debate with Steven Murphy, taken in context, defame Mrs. Porter?

Yes _____ No _____

C. Did statements attributable to Andrea Cabral in the October 31, 2004 *Boston Globe Magazine* article entitled "the New Enforcers," taken in context, defame Mrs. Porter?

Yes _____ No _____

D. What compensatory damages (if any) do you award to plaintiff against defendant Andrea Cabral?

Respectfully submitted,

SHEILA PORTER

By her attorneys,

/s/ Joseph F. Savage, Jr.

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Dated: January 3, 2005